

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SHEET METAL WORKERS LOCAL 265)	
WELFARE FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 07 C 0686
)	
I MASTERS, INC., an Illinois corporation,)	MAGISTRATE JUDGE MARIA VALDEZ
d/b/a INSTALL MASTERS, INC.,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on May 29, 2007, request this Court enter judgment against Defendant, I MASTERS, INC., an Illinois corporation, d/b/a INSTALL MASTERS, INC. In support of that Motion, Plaintiffs state:

1. On May 29, 2007, this Court entered default against Defendant and granted Plaintiffs' request for an order directing an audit of the Defendant's payroll books and records. The Court also entered an order that judgment would be entered after the completion of the audit.
2. Plaintiffs' auditors completed that audit on or about March 3, 2008. On March 27, 2008, the audit findings were issued showing that the Defendant was delinquent in contributions to the Funds in the amount of \$118,501.51. (See Affidavit of Scott P. Wille).
3. Additionally, the amount of \$11,850.15 was due for liquidated damages. (Wille Aff. Par. 5). Plaintiffs' auditing firm of Levinson, Simon & Sprung, P.C. charged Plaintiffs \$1,045.01 to perform the audit examination and complete the report (Wille Aff. Par. 5).

4. After application of all waiver affidavits submitted by Defendant, there remains \$3,971.55 in contributions and \$794.31 in liquidated damages, for a total of \$4,765.86, due for the audit months of April 2007 and May 2007 on behalf of employee Omar Zaragoza (Wille Aff. Par. 6).

5. In addition, Plaintiffs' firm has expended \$745.77 in costs and \$9,433.75 in attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

6. Accordingly, Plaintiffs request entry of judgment in the total amount of \$14,945.38.
WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$14,945.38.

/s/ Jennifer L. Dunitz-Geiringer

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 18th day of August 2009:

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